

UNDER SEAL



MONTCLAIR, NJ NEW YORK, NY

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March 4, 2020

VIA HAND DELIVERY

Clerk, United States District Court
District of New Jersey
Clarkson S. Fisher Building
& U.S. Courthouse
402 East State Street
Trenton, NJ 08608

**Re: HATIKVAH INTERNATIONAL ACADEMY CHARTER SCHOOL v. EAST
BRUNSWICK TOWNSHIP BOARD OF EDUCATION**
Civil Action No. : TBA

Dear Sir/Madam:

We are counsel to Plaintiff Hatikvah International Academy Charter School in the above matter. We herein enclose the following:

1. Proposed Order to Show Cause;
2. Verified Complaint for Preliminary Injunction, with exhibits, under seal;
3. Civil Cover Sheet;
4. Memorandum of Law in Support of Application for Injunctive Relief;
5. *E.M. o/b/o J.B. v. East Orange Board of Education*, decided June 26, 2008 (unreported);
6. Certification of Marcia Grayson, with exhibits, dated January 28, 2020; and
7. Proposed Order for Injunction.

Please note that we respectfully request that you file the exhibits enclosed herewith under seal, pursuant to Local Rule 5.2. Such exhibits are student records protected from public disclosure under the Family Educational Rights and Privacy Act, 20 U.S.C. §1232g and N.J.A.C. 6A:32-7.1 et seq.

This matter arises from an emergent dispute between Hatikvah and East Brunswick Board of Education and H.K.'s parents about the application of the "stay put" automatic injunction provisions under the Individuals with Disabilities Education Act, 20 U.S.C. 1415(j).

Please stamp one copy of the enclosed as "filed" and return to us in the self-addressed, stamped envelope. Thank you for your kind courtesies in this regard.

Respectfully submitted,



Thomas O. Johnston

TJ/yl

Enc.

Cc: **VIA FEDERAL EXPRESS**
Hon. Susan Olgiati, ALJ
Office of Administrative Law
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